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**FILED**

NOV 30 2020

DEPARTMENT OF REAL ESTATE  
By B. Nicholas

9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of )

No. H- 7011 SAC

13 NICOLE ELIZABETH JONES-WATSON, )

ACCUSATION

14 Respondent. )

15 The Complainant, TRICIA D. PARKHURST, in her official capacity as a  
16 Supervising Special Investigator of the Department of Real Estate ("Department") of the State of  
17 California, brings this Accusation against Respondent NICOLE ELIZABETH JONES-  
18 WATSON ("Respondent"), and is informed and alleges as follows:

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20 Respondent is presently licensed and/or has license rights under the Real Estate  
21 Law (Part 1 of Division 4 of the California Business and Professions Code) ("Code") as a real  
22 estate salesperson.

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24 On or about September 9, 2019, in the Superior Court of the State of California,  
25 County of Sacramento, Case No. 19FE000131, Respondent was convicted of violating Section  
26 23153(b) (driving under the influence causing bodily injury) of the California Vehicle Code and  
27 Section 273A(A) (child cruelty: possible injury/death) of the California Penal Code, a crime

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1 which bears a substantial relationship under Section 2910, Title 10, of the California Code of  
2 Regulations (Regulations) to the qualifications, functions or duties of a real estate licensee.

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4 The facts identified in paragraph 2, constitutes cause under Sections 490 and  
5 10177(b) of the Code, for the suspension or revocation of all licenses and license rights of  
6 Respondent under the Real Estate Law.

7 COST RECOVERY

8 4

9 Section 10106 of the Code provides, in pertinent part, that in any order issued in  
10 resolution of a disciplinary proceeding before the Department, the Commissioner may request  
11 the Administrative Law Judge to direct a licensee found to have committed a violation of this  
12 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the  
13 case.

14 WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
15 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary  
16 action against all licenses and license rights of Respondent under the Code, for the cost of  
17 investigation and enforcement as permitted by law, and for such other and further relief as may  
18 be proper under the provisions of law.

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21 TRICIA D. PARKHURST  
22 Supervising Special Investigator  
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25 Dated at Sacramento, California,  
26 this 16<sup>th</sup> day of November, 2020  
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DISCOVERY DEMAND

Pursuant to Sections 11507.6, *et seq.* of the *Government Code*, the Department of Real Estate hereby makes demand for discovery pursuant to the guidelines set forth in the *Administrative Procedure Act*. Failure to provide Discovery to the Department of Real Estate may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate.